

61483-50

11/4/2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

November 4, 2011

Mr. Hubert R. O'Neal
KMG-Bernuth, Inc.
9555 W. Sam Houston Pkwy S.
Suite 600
Houston, TX 77099-2145

Subject: Label Notification(s) for Pesticide Registration Notice 98-10

Dear Mr. O'Neal:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated November 3, 2011 for the following product(s):

Ravap E.C.

EPA Reg. No. 61483-50

The Registration Division (RD) has conducted a review of this request for applicability under PRN 98-10 and finds that the label change(s) requested falls within the scope of PRN 98-10. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact Regina Foushee'-Smith at 703-605-0780.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Gebken".

Richard J. Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

United States EPA Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/>	Registration	OPP Identifier Number
	<input type="checkbox"/>	Amendment	
	<input checked="" type="checkbox"/>	Other	

Application for Pesticide - Section 1

1. Company/Product Number 61483-50	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ravap® E.C.	PM# 10	
5. Name and Address of Applicant (Include Zip Code) KMG-Bernuth, Inc. 9555 W Sam Houston Pkwy S. Ste 600 Houston, Texas 7709-2145 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. NOTIFICATION Product Name <u>NOV 4 2011</u>	

Section - II

<input type="checkbox"/> Amendment - Explain Below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated January 14, 2011
<input type="checkbox"/> Resubmission in response to Agency letter dated	<input type="checkbox"/> "Me Too" Application
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and section II.)

Electronic submission of documents in accordance with Richard Gebken email dated August 3, 2011. The purpose of the submission is to correct label instructions to correspond to actual field usage procedures. The changes consist of replacing oil with water as the diluent in the Poultry Use Directions, Premise Use Directions for Poultry and Livestock Facilities, and in the Kennel Use Directions.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (specify _____)
* Certification must be submitted		If "Yes" Unit Packaging Wt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	5. Location of Label Directions
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued	<input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Dr. Hubert R. O'Neal	Title Regulatory Consultant	Telephone No. (Include Area Code) (713) 819-3932
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Consultant	
4. Typed Name Dr. Hubert R. O'Neal	5. Date August 8, 2011	



August 8, 2011

Office of Pesticides Programs (7504P)
U. S. Environmental Protection Agency
ATTN: RICHARD GEBKEN PM 10
Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Washington, D.C. 20460-0001

Re: Ravap® E.C.
EPA Registration No. 61483-50

Dear Mr Gebken:

In accordance with your email dated August 3, 2011 regarding the label review for the subject product, enclosed are the following documents:

1. Application Form 8570-1 dated August 8, 2011
2. Copy of the label dated August 8, 2011 with proposed changes hi-lited
3. Copy of the proposed clean label for approval, stamping and duplicating for the Agency files.

The changes are necessary to match the label instructions with actual field usage. The changes consist of replacing oil with water as the diluent in the Poultry Use Directions, Premise Use Directions for Poultry and Livestock Facilities, and in the Kennel Use Directions. Oil is utilized as the diluent only in the Backrubber Use Directions.

If you have any questions, please contact me 713-819-3932 or hroneal@suddenlink.net.

Sincerely

Hubert R. O'Neal, PhD

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NOTIFICATION

NOV 4 2011

Page 1 of 8
Ravap EC
8/8/11

Ravap® E.C.

RECOMMENDED FOR AGRICULTURAL/COMMERICAL USE ONLY. NOT FOR SALE FOR ANY OTHER USES.

Contains RABON® and VAPONA® Insecticides

ACTIVE INGREDIENT:

Tetrachlorvinphos (CAS# 22248-79-9).....	23.0%*
Dichlorvos (CAS# 62-73-7).....	5.3%**
Related Compounds	0.4%
OTHER INGREDIENTS:71.3%
TOTAL:	100.0%

*RABON Insecticide
**Equivalent to 5.7% W VAPON Insecticide
This product contains the toxic inert ingredient phenol

EPA Reg.No. 61483-50

EPA Est. No. 67517-MO-1

**KEEP OUT OF REACH OF CHILDREN
DANGER**

FIRST AID

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not give anything by mouth to an unconscious person. Do not induce vomiting unless told to by a poison control center or doctor.

HOTLINE NUMBER

Contains an organophosphate that inhibits cholinesterase.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-322-8177 or CHEMTREC at 1-800-424-9300, 24 hours per day, 7 days per week.

NOTE TO PHYSICIAN

This product is a cholinesterase inhibitor. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered, but only in conjunction with atropine. Product may cause aspiration pneumonia. Probable mucosal damage may contraindicate the use of gastric lavage.

Mfd. For: KMG-Bernuth, Inc
9555 W. Sam Houston Pkwy. S., Ste 600
Houston, Texas 77099-2168 (800) 322-8177

Net Contents: 1 U. S. Gallon
Store above 32° F. Combustible

**CONDITIONS OF SALE AND
LIMITATION OF WARRANTY AND LIABILITY**

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, presence of other materials or other influencing factors in the use of the product, which are beyond the control of **KMG-BERNUTH, INC** or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold **KMG-BERNUTH, INC** and Seller harmless for any claims relating to such factors.

KMG-BERNUTH, INC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or **KMG-BERNUTH, INC**, and Buyer and User assume the risk of any such use **KMG-BERNUTH, INC** MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

It is **KMG-BERNUTH, INC** intention that to the extent allowable under state law, **KMG-BERNUTH, INC**, or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF KMG-BERNUTH, INC AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF KMG-BERNUTH, INC OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

KMG-BERNUTH, INC and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of **KMG-BERNUTH, INC**.

600911

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage or skin burns. Harmful if swallowed or absorbed through skin. Do not get in eyes (including animals), on skin, or on clothing. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove contaminated clothing and wash clothing before reuse.

FOR CHEMICAL EMERGENCY. Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear
- Chemical-resistant apron when cleaning equipment, mixing or loading

USER SAFETY REQUIREMENTS

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should:

Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Drift and runoff may be hazardous to aquatic organisms in adjacent areas. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or when disposing of equipment wash waters.

PHYSICAL AND CHEMICAL HAZARDS

Combustible. Do not use, pour, spill or store near heat or open flame. Do not use with thermal foggers or heat-generating devices.

DIRECTIONS FOR USE – Read the entire label prior to use.

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **For Agricultural/Commercial Use Only.** This product is suitable for use in conventional power or low pressure knapsack sprayers and in livestock backrubbers. Follow the **Use Directions** for the proper dilution needed for specific insect control.

Use Restrictions

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. Do not enter or allow others to enter the treated areas until sprays have dried. Must be diluted with water except for backrubber use.

Livestock Use Directions: Do not make direct application to livestock more frequently than once per day.

Use	Insect	Dilution•Ravap In Water	Remarks
Livestock Spray (Beef Cattle)	Horn Flies, Lice, Including Tail Lice, and aids in control of Face Flies	1 gal. in 75 gal. or 5 oz. in 3 gal.	Dilute in water as indicated and spray directly on the animal only to the point of runoff. Use between ½ to 1 gallon of diluted spray solution per animal depending on size and hair coat. Do not treat more often than every 10 days. Do not apply to calves under six months of age. Brahman and Brahman-cross cattle should not be treated as they may show hypersensitivity to organophosphate pesticides. Do not apply in combination with other dermal organophosphate pesticides (e.g. trichlorofon). There is no withholding period from last application to slaughter.
	Horn Flies, Lone Star Ticks	1 gal. in 200 gal. or 2 oz. in 3 gal	Apply as above. For severe tick infestations, dilution may be increased to 1 gallon in 50 gallons water

Livestock Use Directions: Continued

Use	Insect	Dilution•Ravap In Water	Remarks
Livestock Spray (Lactating Dairy Cattle	Horn Flies, Lice, Lone Star Ticks, and aids in control of Face Flies	1 gal. in 200 gal or 2 oz. in 3 gal.	Dilute in water as indicated. Direct spray to cover thoroughly with up to ½ gallon of the dilution per animal. Repeat as necessary. Do not apply to calves under six months of age. No milk discard is required. Care should be taken that the spray does not come in direct contact with the lactating dairy cow's teats unless they are washed with an approved cleansing solution and dried before milking. Apply the spray at least 20 minutes prior to milking or after milking has been completed.

Backrubber Use Directions

Use	Insect	Dilution•Ravap In Oil	Remarks
Backrubber or Facerubber (Beef and Dairy Cattle	Horn Flies, and aids in control of Face Flies	1 gal. in 25 gal or 5 oz. in 1 gal	Mix with any approved backrubber base oil. Pour diluted solution into oil reservoir of mechanical rubbing devices or pour one gallon per 20 linear feet on burlap or rope backrubbers. Keep backrubber or facerubber charged.

Poultry Use Directions

Use	Insect	Dilution•Ravap In Water	Remarks
Caged Chickens	Lice & Mites	1 gal. in 50 gal or 5 oz. in 2 gal	Apply 1 gal. of dilution/100 birds under high pressure (no less than 100-125 psi) to the vent and fluff areas from below. Repeat when necessary; however, not more often than every 14 days. For individual bird treatment, apply 1 ounce of dilution per bird.
Chickens On Litter	Lice & Mites	1 gal. in 50 gal or 5 oz. in 2 gal	Apply 1-2 gal. of dilution/1000 sq. ft. evenly with penetration of litter surface. Also apply thoroughly to walls, roosts, cracks and crevices. Spray birds as above. Treat roosters carefully to avoid reinfestation of breeding flocks.
Roost Paint	Lice & Mites	1 gal. in 25 gal or 5 oz. in 1 gal	Apply 1 pt. of dilution/100 ft. of roost area with brush or spray.
Poultry Buildings	Fowl Tick (Blue Bug)	1 gal. in 25 gal or 5 oz. in 1 gal	Apply 1 gal. of dilution/100-150 sq. ft. to thoroughly cover walls, ceilings, floors, cracks and crevices using high pressure spray.

Premise Use Directions for Poultry and Livestock Facilities

Use	Insect	Dilution•Ravap In Water	Remarks
Residual Surface Spray	Flies, Gnats, Litter Beetles, Mosquitoes, Spiders, Wasps	1 gal. in 25 gal or 5 oz. in 1 gal	Apply 1 gal. of dilution/500-1000 sq. ft. Thoroughly cover walls, ceilings or other areas where pests rest or congregate in dairy barns, horse barns, poultry houses, swine buildings, livestock sheds and other farm buildings. Extreme infestations may necessitate increasing the diluted spray to one gallon per 12-1/2 gal. or 10 oz. per 1 gal. of water.
Larvicide	Maggots (fly larvae)	1 gal. in 25 gal or 5 oz. in 1 gal	Apply 1 gal. of dilution/100 sq. ft. of droppings as a coarse spray. Repeat at 7-10 day intervals until droppings begin to cone up, then treat only "hot spots" (small areas found to have large number of maggots). Do not spray manure where runoff to soil or water can occur. Do not spray animals directly with this concentration.

Kennel Use Directions

Use	Insect	Dilution•Ravap In Water	Remarks
Residual Surface Spray – Kennels	Ticks, Fleas	1 gal. in 50 gal or 5 oz. in 2 gal	Apply 1 gal. of dilution/500-1000 sq. ft. Thoroughly treat infested kennel and outside runways.

STORAGE AND DISPOSAL

DO NOT contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store product in its original container in a cool, dry place in an area inaccessible to children and animals.

PESTICIDE DISPOSAL: Pesticide wastes are acutely toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your state pesticide or environmental control agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling, if available, for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

RAVAP® is a trademark of KMG-BERNUTH, INC.